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*Attorneys for Plaintiff* MEDIATEK INC.

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION**

MEDIATEK INC.

Plaintiff,

v.

FREESCALE SEMICONDUCTOR, INC.

Defendant.

**Civil Action No. 4:11-cv-05341 (YGR)  
 (JSC)**

**DECLARATION OF  
 MH SHIEH IN SUPPORT OF  
 FREESCALE SEMICONDUCTOR  
 INC.'S ADMINISTRATIVE MOTION  
 TO FILE UNDER SEAL**

**DEMAND FOR JURY TRIAL**

1 I, MH Shieh, declare as follows:

2 I am an employee of MediaTek Inc. ("MediaTek"), plaintiff in the above-captioned  
3 matter. My current job title is Special Assistant to the General Manager. I submit this  
4 declaration in support of Freescale Semiconductor Inc.'s ("Freescale") Administrative Motion to  
5 File Under Seal Freescale's Letter Brief Regarding Practicing Products ("Administrative  
6 Motion") pursuant to Local Rules 7-11 and 79-5. I have personal knowledge of the facts set  
7 forth in this declaration and, if called to testify as a witness, could and would do so competently.

8 1. Freescale's Administrative Motion seeks to have filed under seal confidential,  
9 unredacted versions of Freescale's Letter Brief Regarding Practicing Products ("Freescale's  
10 Letter Brief") and Exhibits 2, 3, 4, 5, and 6 to Freescale's Letter Brief. Freescale's Letter Brief  
11 and Exhibits 2, 3, 4, 5, and 6 contain deposition testimony concerning confidential information  
12 on the development and customers of a yet-to-be released MediaTek processor, as well several  
13 existing MediaTek products.

14 2. MediaTek does not publicly disclose information concerning the design and  
15 development of its products. Instead, MediaTek protects this information as a trade secret, and  
16 takes steps to ensure that this information remains confidential, including marking the  
17 information included as Freescale's Letter Brief and Exhibits 2, 3, 4, 5, and 6 as "HIGHLY  
18 CONFIDENTIAL – ATTORNEYS' EYES ONLY" when MediaTek produced this information  
19 in this action. If this information were publicly disclosed, MediaTek's competitors could use the  
20 information in Freescale's Letter Brief and Exhibits 2, 3, 4, 5, and 6 to MediaTek's economic  
21 disadvantage by designing their own competing processors to mirror the designs of MediaTek's  
22 products. Therefore, the requested relief is necessary to protect MediaTek from such  
23 competitive harm.

24 3. Similarly, MediaTek does not publicly disclose information concerning potential  
25 customers with which MediaTek works on the design and development of its products. As with  
26 information concerning the development of new products, MediaTek takes steps to protect the  
27 confidentiality of information concerning potential customers, and has marked the information  
28



1 that it has produced in this litigation, and that is included in Freescale's Letter Brief and Exhibits  
2 2, 3, 4, 5, and 6 as "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY." If disclosed,  
3 MediaTek's competitors could use this information to MediaTek's disadvantage by designing  
4 their development and marketing strategies based on MediaTek's relationships with these  
5 customers, and could result in MediaTek losing product sales to these customers. Thus, the  
6 requested sealing of this information is necessary to protect MediaTek from this economic harm.

7 4. The requested relief is narrowly tailored to protect the confidentiality of this  
8 information. Only those portions of Freescale's Letter Brief and Exhibits 2, 3, 4, 5, and 6 that  
9 describe the development MediaTek's products, as well as the potential customers of the yet-to-  
10 be-released product, are covered by Freescale's Administrative Motion.

11 I declare under penalty of perjury under the laws of the United States that the foregoing is  
12 true and correct.

13  
14 Dated: September 6, 2013

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16 *Meng-Hann Shieh*

17 MH Shieh  
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